

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM
POWDER PRODUCTS MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

MDL NO. 3:16-MD-02738
JUDGE FREDA L. WOLFSON
MAG. JUDGE LOIS H. GOODMAN

**THIS RELATES TO DOC ID 14906,
CASES INCLUDED ON EXHIBIT A
TO DEFENDANTS' MOTION TO
DISMISS PLAINTIFFS' COMPLAINT
PURSUANT TO 41B:**

**Sara Walker v. Johnson & Johnson et al.
Case No. 3:16-cv-08963**

**RESPONSE TO DEFENDANTS' MOTION TO DISMISS
PLAINTIFFS' COMPLAINT PURSUANT TO 41B**

Plaintiff, Sara Walker, through her counsel, respectfully appears to advise the Court that no grounds currently exist to oppose the dismissal sought by Defendants. Over the last several months numerous attempts were made to contact Plaintiff Sara Walker by phone and mail and FedEx, and while it is unknown whether Ms. Walker received the material sent to her last known address, she was sent notice of Court's Orders concerning the duties of the discovery pool plaintiffs, and the delivery was tracked to that address. Counsel can advise the Court that no phone number for Plaintiff now works, and that Plaintiff has not returned other forms and documents requested by her counsel during a time period before the September 17, 2020 Orders [Doc. No. 14728]; [Doc. No. 14729]; [Doc. No. 14749] that are the subject of the instant motion.

Plaintiff counsel's firm practice is to send regular reminders to its clients reminding the clients to notify counsel when their phone numbers or email or street addresses change. Undersigned counsel has not been notified of any such change, and we have been unable to locate the Plaintiff to cure deficiencies and obtain authorizations.

While Plaintiff's counsel respectfully advises this Court that counsel has no good faith grounds at this time to oppose the relief sought, experience has proven that sometimes there are good and sufficient grounds for non-contact, especially in this age of Covid-19. Counsel has no way to determine if some sudden illness necessitated Plaintiff's loss of contact, and so respectfully suggests that as Plaintiff was not chosen as a Bellwether pool of 30 case, Plaintiff not be dismissed at this time.

Submitted October 19, 2020

/s/ Richard L. Root

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the attached document was served upon each attorney
of record through the Court's Electronic Court Filing System.

Submitted October 19, 2020

/s/ Richard L. Root